

JACQUELINE TIRINNANZI, ESQ.
Nevada Bar No. 13266
jt@kathleenblisslaw.com
KATHLEEN BLISS LAW PLLC
170 South Green Valley Parkway
Suite 300
Henderson, Nevada 89012
Telephone: 702.912.3834

Attorney for Maurice Williamson

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MAURICE WILLIAMSON,

Defendant.

CASE NO. 2:21-cr-00129-APG-EJY

**STIPULATION TO CONTINUE
SENTENCING (Second Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney for the District of Nevada, and Joshua Brister, Assistant United States Attorney, and Jacqueline Tirinnanzi, counsel for Defendant Maurice Williamson, that the sentencing hearing currently scheduled for March 8, 2023, at 9:00 a.m. (ECF No. 65) is continued for no sooner than 90 days, to a date and time convenient to this Court. This stipulation is made and based upon the following:

1. Mr. Williamson entered a change of plea on October 20, 2022, pleading guilty to one count of Felon in Possession of a Firearm, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2). ECF No. 65.
2. For the duration of his case, Mr. Williamson was on pretrial release and has been fully compliant with the conditions of his release. No. 12.

KATHLEEN BLISS LAW PLLC
1070 W. HORIZON RIDGE PKWY., SUITE 202
HENDERSON NEVADA 89012
TEL – 702.463.9074

3. On January 26, 2023, this Court entered an order in the instant case (ECF Nos. 83, 84; Order for Family/Attorney Visitation) permitting Mr. Williamson (and two other relatives) visitation with his son and co-defendant Maurice Williamson Jr. at the medical facility where he is located. The visitation order was sought because of a recent turn of events culminating in Mr. Williamson Jr.'s medical diagnosis and bleak prognosis (circumstances which this Court is aware). Mr. Williamson requests additional time with his son prior to a potential custodial sentence.
4. Furthermore, due to the challenging and unfortunate circumstances that Mr. Williamson and the Williamson family are coming to terms with, additional time is requested to continue gathering materials in support of Mr. Williamson's sentencing memorandum and hearing (for instance, counsel is still awaiting numerous medical records, one set of which is "archived" and awaiting retrieval).
5. Mr. Williamson does not oppose the continuance request.
6. This is the second request for a continuance of the sentencing hearing.
7. The additional time requested herein is sought in good faith and not for purposes of delay.
8. The additional time requested by this stipulation is reasonable pursuant to Fed. R. Crim. P. 32(b)(2), which states that the "court may, for good cause, change any time limits prescribed [for sentencing] in this rule." Furthermore, a delay in sentencing does not implicate or undermine the defendant's speedy trial rights under the United States Constitution, which terminated upon conviction. *See Betterman v. Montana*, 136 S.Ct. 1609, 1617-18 (2016).
9. Denial of this request for continuance would deny counsel for Mr. Williamson sufficient time to effectively and thoroughly prepare for sentencing, taking into

1 account due diligence. Accordingly, a denial of this request for continuance could
2 result in a miscarriage of justice.
3

4 Dated this 23rd day of February 2023.
5
6

7 /s/Joshua Brister
8 Assistant U.S. Attorney
9 Counsel for the United States
10
11

/s/Jacqueline Tirinnanzi
Counsel for Maurice Williamson
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

KATHLEEN BLISS LAW PLLC
1070 W. HORIZON RIDGE PKWY., SUITE 202
HENDERSON NEVADA 89012
TEL – 702.463.9074

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MAURICE WILLIAMSON,

Defendant.

CASE NO. 2:21-cr-00129-APG-EJY

**FINDINGS OF FACT, CONCLUSIONS OF
LAW, AND ORDER**

FINDINGS OF FACT

Based on the pending stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Mr. Williamson entered a change of plea on October 20, 2022, pleading guilty to one count of Felon in Possession of a Firearm, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2). ECF No. 65.
2. For the duration of his case, Mr. Williamson was on pretrial release and has been fully compliant with the conditions of his release. No. 12.
3. On January 26, 2023, this Court entered an order in the instant case (ECF Nos. 83, 84; Order for Family/Attorney Visitation) permitting Mr. Williamson (and two other relatives) visitation with his son and co-defendant Maurice Williamson Jr. at the medical facility where he is located. The visitation order was sought because of a recent turn of events culminating in Mr. Williamson Jr.'s medical diagnosis and bleak prognosis (circumstances which this Court is aware). Mr. Williamson requests additional time with his son prior to a potential custodial sentence.
4. Furthermore, due to the challenging and unfortunate circumstances that Mr. Williamson and the Williamson family are coming to terms with, additional time

1 is requested to continue gathering materials in support of Mr. Williamson's
2 sentencing memorandum and hearing (for instance, counsel is still awaiting
3 numerous medical records, one set of which is "archived" and awaiting retrieval).

4
5 5. Mr. Williamson does not oppose the continuance request.

6 6. This is the first request for a continuance of the sentencing hearing.

7 7. The additional time requested herein is sought in good faith and not for purposes
8 of delay.

9 8. The additional time requested by this stipulation is reasonable pursuant to Fed. R.
10 Crim. P. 32(b)(2), which states that the "court may, for good cause, change any
11 time limits prescribed [for sentencing] in this rule." Furthermore, a delay in
12 sentencing does not implicate or undermine the defendant's speedy trial rights
13 under the United States Constitution, which terminated upon conviction. *See*
14 *Betterman v. Montana*, 136 S.Ct. 1609, 1617-18 (2016).


15
16 9. Denial of this request for continuance would deny counsel for Mr. Williamson
17 sufficient time to effectively and thoroughly prepare for sentencing, taking into
18 account due diligence. Accordingly, a denial of this request for continuance could
19 result in a miscarriage of justice.
20
21
22
23
24
25
26
27
28

ORDER

Based upon the stipulation of the parties, and good cause appearing, it is hereby ORDERED that Mr. Williamson's sentencing hearing currently scheduled for March 8, 2023, at 9:00 a.m., be VACATED.

IT IS FURTHER ORDERED that the sentencing hearing is reset for June 14, 2023 at 1:30 p.m. in Courtroom 6C before Judge Andrew P. Gordon.

DATED: February 24, 2023



THE HONORABLE ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE

KATHLEEN BLISS LAW PLLC
1070 W. HORIZON RIDGE PKWY., SUITE 202
HENDERSON NEVADA 89012
TEL - 702.463.9074